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8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 Glorium Technologies Corp.

Case No. 2:24-cv-00712-JAD-EJY

11 Plaintiff,

12 vs.

13 BB8, LLC,

14 Defendant.

15

BB8, LLC,

16 Counterclaimant,

17 vs.

18 Glorium Technologies Corp., DOES 1-10,

19 Counterclaim Defendants.

20 **STIPULATION TO EXTEND CERTAIN
DISCOVERY DEADLINES AND
ORDER THEREON**

21 **(First Request)**

22
23 The parties, pursuant to Federal Rule of Civil Procedure 6(b), LR IA 6-1, and [LR 7-2],
24 stipulate extending the remaining deadlines in this matter. This is the first request for the
25 extension of scheduled deadlines. This stipulation and order does not include the deadlines for
26 disclosure of expert witnesses or of rebuttal expert witnesses.
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1 On January 6, 2025, at a hearing on the Defendant's Motion for Protective Order, the
2 Honorable Elayna J. Youchah established, *inter alia*, the following deadlines for this case:
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- 4
- 5 • Close of discovery (April 30, 2025);
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 - 7 • Filing of dispositive motions (May 30, 2025); and
8
 - 9 • Joint pretrial order (June 30, 2025, unless dispositive motions are filed, then 30
10 days after the decision on dispositive motions)

11 The parties have stipulated extending the above deadlines by 75 days. The new dates
12 would be as follows:
13

- 14 • Close of discovery: July 14, 2025;
- 15 • Filing of dispositive motions: August 13, 2025; and
16
- 17 • Joint pretrial order (September 15, 2025, unless dispositive motions are filed,
18 then 30 days after the decision on dispositive motions)

19 The parties respectfully submit that this extension is necessary due to the complexity of
20 this case and the ongoing resolution of significant discovery disputes. This case involves intricate
21 factual and legal issues concerning software development, contractual obligations, fraud
22 allegations (including fraud in the inducement as related to the breach of contract action), and the
23 authenticity of Glorium's customer testimonials. Given the extensive volume of documents and
24 electronic records involved, both parties require additional time to review, analyze, and produce
25 the necessary materials to ensure a full and fair discovery process.

26 Furthermore, the parties have been actively working to resolve multiple discovery
27 disputes, which have impacted the ability to efficiently complete discovery within the existing
28 deadlines. These disputes have already required motion practice and court intervention,
including the hearing on January 6, 2025 when the current scheduling dates were ordered. Since
then, discovery disputes have arisen, and they are currently in the discussion phase, with no
motions yet filed.

Despite ongoing meet-and-confer efforts, additional time is needed to resolve such outstanding issues related to document production, Admissions requests, and interrogatory responses.

Additionally, both parties anticipate the need to conduct depositions of key witnesses, including Glorium's employees and BB8's representatives.

Given the technical nature of the claims and defenses, expert testimony will likely play a critical role, and both parties also require time to conduct expert depositions.

Accordingly, good cause exists for extending the discovery deadlines to allow the parties to complete document discovery, conduct depositions, and address outstanding discovery disputes. The requested extension will facilitate a thorough and fair discovery process without prejudicing either party or unduly delaying the proceedings.

Date: March 18, 2025

/s/ Jeffrey D. Harris
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Date: March 19, 2025

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IT IS SO ORDERED.

Date: March 19, 2025

Eayna J. Youchah
HONORABLE EAYNA J. YOUCAH
UNITED STATES MAGISTRATE JUDGE